

Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address Derrick Talerico (Bar # 223763) David B. Zolkin (Bar # 155410) WEINTRAUB ZOLKIN TALERICO & SELTH LLP 11766 Wilshire Blvd., Suite 730 Los Angeles, CA 90025 Telephone: (424) 500-8552 Email: dtalerico@wztslaw.com dzolkin@wztslaw.com	FOR COURT USE ONLY
<input checked="" type="checkbox"/> Attorney for: Corporate Debtors	
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION	
In re: SEATON INVESTMENTS, LLC, <i>et al.</i> , Debtor.	CASE NO.: 2:24-12079-VZ (Jointly Administered) CHAPTER: 11
<input type="checkbox"/> Affects All Debtors <input type="checkbox"/> Affects Seaton Investments, LLC (2:24-bk-12079-VZ) <input checked="" type="checkbox"/> Affects Colyton Investments, LLC (2:24-bk-12080-VZ) <input type="checkbox"/> Affects Broadway Avenue Investments, LLC (2:24-bk-12081-VZ) <input type="checkbox"/> Affects SLA Investments, LLC (2:24-bk-12082-VZ) <input type="checkbox"/> Affects Negev Investments, LLC (2:24-bk-12091-VZ) <input type="checkbox"/> Affects Alan Gomperts (2:24-bk-12074-VZ) <input type="checkbox"/> Affects Daniel Halevy (2:24-bk-12075-VZ) <input type="checkbox"/> Affects Susan Halevy (2:24-bk-12076-VZ) Debtor(s).	NOTICE OF OBJECTION TO CLAIM DATE: 09/10/2024 TIME: 11:00 am COURTROOM: 1368 PLACE: 255 E. Temple Street, Los Angeles, CA 90012

1. TO (specify claimant and claimant's counsel, if any): LOS ANGELES COUNTY TREASURER AND TAX COLLECTOR

2. NOTICE IS HEREBY GIVEN that the undersigned has filed an objection to your Proof of Claim (Claim # 1) filed in the above referenced case. The Objection to Claim seeks to alter your rights by disallowing, reducing or modifying the claim based upon the grounds set forth in the objection, a copy of which is attached hereto and served herewith.

3. **Deadline for Opposition Papers:** You must file and serve a response to the Objection to Claim not later than 14 days prior to the hearing date set forth above.

IF YOU FAIL TO TIMELY RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.

Date: 08/09/2024

WEINTRAUB ZOLKIN TALERICO & SELTH LLP
Printed name of law firm

/s/ Derrick Talerico
Signature

Date Notice Mailed: 08/09/2024

Derrick Talerico
Printed name of attorney for objector

This form is mandatory. It has been approved for use in the United States Bankruptcy Court for the Central District of California.

Derrick Talerico (SBN 223763)
dtalerico@wztslaw.com
David B. Zolkin (SBN 155410)
dzolkin@wztslaw.com
WEINTRAUB ZOLKIN TALERICO &
SELTH LLP
11766 Wilshire Boulevard, Suite 730
Los Angeles, CA 90025
Telephone: (424) 500-8552

*Attorneys for Debtors and Debtors
in Possession, Seaton Investments, LLC,
Colyton Investments, LLC, Broadway Avenue Investments, LLC,
SLA Investments, LLC, and Negev Investments, LLC*

**UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA – LOS ANGELES DIVISION**

In re:

SEATON INVESTMENTS, LLC, *et al.*,

Debtors and Debtors In
Possession.

- ☐ Affects All Debtors.
☐ Affects Seaton Investments, LLC
☒ Affects Colyton Investments, LLC
☐ Affects Broadway Avenue Investments, LLC
☐ Affects SLA Investments, LLC
☐ Affects Negev Investments, LLC
☐ Affects Alan Gomperts
☐ Affects Daniel Halevy
☐ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-12076-VZ

Chapter 11

**COLYTON INVESTMENTS, LLC'S
OBJECTION TO CLAIM NO. 1 OF
LOS ANGELES COUNTY
TREASURER AND TAX
COLLECTOR; MEMORANDUM OF
POINTS AND AUTHORITIES;
DECLARATION DERRICK
TALERICO IN SUPPORT THEREOF**

Hearing:

Date: September 10, 2024

Time: 11:00 a.m.

Courtroom: 1368

255 East Temple St.

Los Angeles, CA 90012

Judge: Hon. Vincent Zurzolo

WEINTRAUB ZOLKIN TALERICO & SELTH LLP
11766 WILSHIRE BLVD., SUITE 730
LOS ANGELES, CA 90025

Colyton Investments, LLC, ("Colyton"), one of the debtors and debtors-in-possession in the pending jointly administered chapter 11 bankruptcy cases herein, hereby objects (the "Objection") to Proof of Claim No. 1 ("LACTTC Claim") filed by the Los Angeles County Treasurer and Tax Collector ("LACTTC") in Colyton's bankruptcy case (the "Case").

The LACTTC Claim asserts a secured claim in the amount of \$93,820.01, secured by a statutory lien under California law for the real property with Assessors ID Number 5163-025-007 and Situs Address of 421 Colyton St, Los Angeles, CA 90013-2210. The LACTTC Claim is supported by a Substitute Secured Property Tax Bill in the amount of \$46,915.01 for 2023-2024, and an Attachment Sheet that estimates taxes for 2024-2025 at \$46,905.00. A true and correct copy of Claim No. 1 as it appears on the Court's electronic claims register for the Case is attached hereto as Exhibit 1.

The grounds for Colyton's Objection to the LACTTC Claim are:

1. The taxes that pertain to 2024-2025 are not yet due; and
2. LACTTC does not provide any itemization of the amounts claimed for 2024-2025.

WHEREFORE, Colyton respectfully requests that the Court sustain its objection to LACTTC Claim and disallow Proof of Claim No. 1 as to the \$46,905.00 of taxes relating to 2024-2025 and set the LACTTC Claim at \$46,915.01.

DATED: August 9, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

By: /s/ Derrick Talerico

Derrick Talerico

David B. Zolkin

*Attorneys for Debtors and Debtors
in Possession, Seaton Investments, LLC,
Colyton Investments, LLC, Broadway Avenue
Investments, LLC, SLA Investments, LLC, and
Negev Investments, LLC*

MEMORANDUM OF POINTS AND AUTHORITIES

I. INTRODUCTION

The \$46,905.00 of the LACTTC Claim that pertain to 2024-2025 are not yet due and as such are not properly asserted. Furthermore, the \$46,905.00 for 2024-2025 are estimated and not set forth in any detail or itemization.

II. STATEMENT OF FACTS

Colyton filed its bankruptcy petition on March 20, 2024 (the “Petition Date”). LACTTC filed Proof of Claim No. 1 in the Colyton case for \$93,820.01, secured by a statutory lien under California law for the real property with Assessors ID Number 5163-025-007 and address of 421 Colyton St, Los Angeles, CA 90013-2210. The LACTTC Claim is supported by a Substitute Secured Property Tax Bill in the amount of \$46,915.01 for 2023-2024, and an Attachment Sheet that estimates taxes for 2024-2025 at \$46,905.00. A true and correct copy of Proof of Claim No. 1 as it appears on the Court’s electronic claims register for the Case is attached hereto as **Exhibit 1**.

III. LEGAL DISCUSSION

Creditors may file proofs of claim. 11 U.S.C. § 501. Claims are deemed allowed unless a party in interest objects. 11 U.S.C. § 502. A filed proof of claim “constitute[s] prima facie evidence of the validity and amount of the claim.” Fed. R. Bankr. P. 3001(f). The presumption of prima facie validity is rebuttable. *In re Garner*, 246 B.R. 617, 622 (B.A.P. 9th Cir. 2000). “If rebutted, then the ultimate burden of proof is on the claimant.” *Id.* “[T]he ultimate burden of persuasion is always on the claimant.” *In re Holm*, 931 F.2d 620, 623 (9th Cir. 1991).

The LACTTC Claim is supported by a Substitute Secured Property Tax Bill showing an amount of total tax due of \$46,915.01. Colyton does not dispute this portion of the LACTTC Claim. The other portion of the LACTTC Claim is an estimation of taxes due for 2024-2025, which is stated in the Attachment Sheet to be \$46,905.00. The 2024-2025 taxes come due in two installments, the first payment comes due on or about December 10, 2024 and the second payment comes due on or about April 10, 2025. While a lien for the amount that will be due for 2024-2025 has attached to the property as of January 1, 2024, those amounts are not yet due and are not properly asserted as part of the amount owed by Colyton to LACTTC as of the Petition Date.

1 **IV. CONCLUSION**

2 Based upon the foregoing, Colyton respectfully requests that the Court sustain its objection
3 to LACTTC Claim and disallow Proof of Claim No. 1 as to the \$46,905.00 of taxes relating to 2024-
4 2025 and set the LACTTC Claim at \$46,915.01.

5 DATED: August 9, 2024

**WEINTRAUB ZOLKIN TALERICO & SELTH
LLP**

7 By: /s/ Derrick Talerico

8 Derrick Talerico

9 David B. Zolkin

Attorneys for Debtors and Debtors

in Possession, Seaton Investments, LLC,

Colyton Investments, LLC, Broadway Avenue

Investments, LLC, SLA Investments, LLC, and

Negev Investments, LLC

WEINTRAUB ZOLKIN TALERICO & SELTH LLP
11766 WILSHIRE BLVD., SUITE 730
LOS ANGELES, CA 90025

DECLARATION OF DERRICK TALERICO

I, Derrick Talerico, declare as follows:

1. I am an attorney duly licensed to practice before all of the courts in the State of California and entitled to practice in this Court. I am a partner with Weintraub Zolkin Talerico & Selth LLP, counsel of record for the Colyton Investments, LLC (and four other debtors who are not parties to this Objection), in in these jointly administered chapter 11 cases. I have personal knowledge of the facts set forth in this Declaration and, if called as a witness, could and would competently testify to such facts under oath.

2. The Los Angeles County Treasurer and Tax Collector ("LACTTC") filed claim no 1 in the bankruptcy case of Colyton Investments, LLC, in which it claims \$93,820.01, secured by a statutory lien under California law for the real property with Assessors ID Number 5163-025-007 and Situs Address of 421 Colyton St, Los Angeles, CA 90013-2210 ("LACTTC Claim").

3. Attached hereto as **Exhibit 1** is a true and correct copy of the LACTTC Claim, which was obtained from the Court's claims registers in the Colyton Case.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Executed on this 9th day of August, 2024, at Los Angeles, California.

s/ Derrick Talerico

Derrick Talerico

EXHIBIT 1

LA County Treasurer & Tax Collector Proof of Claim 1

Fill in this information to identify the case:

Debtor 1 Colyton Investments, LLC

Debtor 2
(Spouse, if filing) _____

United States Bankruptcy Court for the: Central District of California

Case number 2:24-bk-12080-VZ (11)

Official Form 410

Proof of Claim

04/19

Read the instructions before filling out this form. This form is for making a claim for payment in a bankruptcy case. Do not use this form to make a request for payment of an administrative expense. Make such a request according to 11 U.S.C. § 503.

Filers must leave out or redact information that is entitled to privacy on this form or on any attached documents. Attach redacted copies of any documents that support the claim, such as promissory notes, purchase orders, invoices, itemized statements of running accounts, contracts, judgments, mortgages, and security agreements. Do not send original documents; they may be destroyed after scanning. If the documents are not available, explain in an attachment.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Fill in all the information about the claim as of the date the case was filed. That date is on the notice of bankruptcy (Form 309) that you received.

Part 1: Identify the Claim

1. Who is the current creditor?

Los Angeles County Treasurer and Tax Collector

Name of the current creditor (the person or entity to be paid for this claim)

Other names the creditor used with the debtor _____

2. Has this claim been acquired from someone else?

☒ No

☐ Yes. From whom? _____

3. Where should notices and payments to the creditor be sent?

Federal Rule of Bankruptcy Procedure (FRBP) 2002(g)

Where should notices to the creditor be sent?

Los Angeles County Treasurer & Tax Collector

Name

PO Box 54110

Number Street

Los Angeles

CA

90054

City

State

ZIP Code

Contact phone (213) 974-7803

Contact email bankruptcy@ttc.lacounty.gov

Where should payments to the creditor be sent? (if different)

Name

Number

Street

City

State

ZIP Code

Contact phone _____

Contact email _____

Uniform claim identifier for electronic payments in chapter 13 (if you use one):

4. Does this claim amend one already filed?

☒ No

☐ Yes. Claim number on court claims registry (if known) _____

Filed on

MM / DD / YYYY

5. Do you know if anyone else has filed a proof of claim for this claim?

☒ No

☐ Yes. Who made the earlier filing? _____

Part 2: Give Information About the Claim as of the Date the Case Was Filed

6. Do you have any number you use to identify the debtor? ☐ No
☒ Yes. Last 4 digits of the debtor's account or any number you use to identify the debtor: 5 0 0 7

7. How much is the claim? \$ 93,820.01 Does this amount include interest or other charges?
☐ No
☒ Yes. Attach statement itemizing interest, fees, expenses, or other charges required by Bankruptcy Rule 3001(c)(2)(A).

8. What is the basis of the claim? Examples: Goods sold, money loaned, lease, services performed, personal injury or wrongful death, or credit card.
Attach redacted copies of any documents supporting the claim required by Bankruptcy Rule 3001(c).
Limit disclosing information that is entitled to privacy, such as health care information.
Property Taxes

9. Is all or part of the claim secured? ☐ No
☒ Yes. The claim is secured by a lien on property.
Nature of property:
☒ Real estate. If the claim is secured by the debtor's principal residence, file a *Mortgage Proof of Claim Attachment* (Official Form 410-A) with this *Proof of Claim*.
☐ Motor vehicle
☐ Other. Describe: _____
Basis for perfection: _____
Attach redacted copies of documents, if any, that show evidence of perfection of a security interest (for example, a mortgage, lien, certificate of title, financing statement, or other document that shows the lien has been filed or recorded.)
Value of property: \$ 3,078,562.00
Amount of the claim that is secured: \$ 93,820.01
Amount of the claim that is unsecured: \$ _____ (The sum of the secured and unsecured amounts should match the amount in line 7.)
Amount necessary to cure any default as of the date of the petition: \$ _____
Annual Interest Rate (when case was filed) 18.00 %
☒ Fixed
☐ Variable

10. Is this claim based on a lease? ☒ No
☐ Yes. Amount necessary to cure any default as of the date of the petition. \$ _____

11. Is this claim subject to a right of setoff? ☒ No
☐ Yes. Identify the property: _____

12. Is all or part of the claim entitled to priority under 11 U.S.C. § 507(a)?

☒ No

☐ Yes. Check one:

Amount entitled to priority

A claim may be partly priority and partly nonpriority. For example, in some categories, the law limits the amount entitled to priority.

☐ Domestic support obligations (including alimony and child support) under 11 U.S.C. § 507(a)(1)(A) or (a)(1)(B).

\$ _____

☐ Up to \$3,025* of deposits toward purchase, lease, or rental of property or services for personal, family, or household use. 11 U.S.C. § 507(a)(7).

\$ _____

☐ Wages, salaries, or commissions (up to \$13,650*) earned within 180 days before the bankruptcy petition is filed or the debtor's business ends, whichever is earlier. 11 U.S.C. § 507(a)(4).

\$ _____

☐ Taxes or penalties owed to governmental units. 11 U.S.C. § 507(a)(8).

\$ _____

☐ Contributions to an employee benefit plan. 11 U.S.C. § 507(a)(5).

\$ _____

☐ Other. Specify subsection of 11 U.S.C. § 507(a)() that applies.

\$ _____

* Amounts are subject to adjustment on 4/01/22 and every 3 years after that for cases begun on or after the date of adjustment.

Part 3: Sign Below

The person completing this proof of claim must sign and date it. FRBP 9011(b).

If you file this claim electronically, FRBP 5005(a)(2) authorizes courts to establish local rules specifying what a signature is.

A person who files a fraudulent claim could be fined up to \$500,000, imprisoned for up to 5 years, or both. 18 U.S.C. §§ 152, 157, and 3571.

Check the appropriate box:

☐ I am the creditor.

☒ I am the creditor's attorney or authorized agent.

☐ I am the trustee, or the debtor, or their authorized agent. Bankruptcy Rule 3004.

☐ I am a guarantor, surety, endorser, or other codebtor. Bankruptcy Rule 3005.

I understand that an authorized signature on this *Proof of Claim* serves as an acknowledgment that when calculating the amount of the claim, the creditor gave the debtor credit for any payments received toward the debt.

I have examined the information in this *Proof of Claim* and have a reasonable belief that the information is true and correct.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on date 05/15/2024
MM / DD / YYYY

Maya Hill

Signature

Print the name of the person who is completing and signing this claim:

Name	Maya	A	Hill
	First name	Middle name	Last name
Title	Tax Services Clerk II		
Company	County of Los Angeles		
	Identify the corporate servicer as the company if the authorized agent is a servicer.		
Address	PO Box 54110		
	Number	Street	
	Los Angeles	CA	90054
	City	State	ZIP Code
Contact phone	(213) 974-7803		Email bankruptcy@tlc.lacounty.gov

SUBSTITUTE SECURED PROPERTY TAX BILL

JULY 1, 2023 TO JUNE 30, 2024

CRT: R#43
E655416

LOS ANGELES COUNTY TAX COLLECTOR

225 North Hill Street, Los Angeles, CA 90012

FOR ASSISTANCE CALL 1(213) 974-2111 OR 1(888) 807-2111, ON THE WEB AT lacountypropertytax.com

5163 025 007
COLYTON INVESTMENTS LLC
264 S OAKHURST DR
BEVERLY HILLS CA 90212-3504

ELECTRONIC FUND TRANSFER NUMBER
ID#:19 5163 025 007 1 YR:23 SEQ:0003

SITUS ADDRESS:
421 COLYTON ST
LOS ANGELES CA 90013-2210

ASSESSOR'S ID. NO.												
Map Book	Page	Parcel	Year	Seq. No.	1ST INSTALLMENT		2ND INSTALLMENT		TOTAL TAX		Penalties Apply	
5163	025	007	23	000	12 10 23		04 10 24				When Shown	
					10% Penalty After		10% Penalty + \$10.00 Cost After					
					TAX		21320 47		21320 46		42640 93	
					PENALTY		2132 04		2142 04		4274 08	
					TOTAL		23452 51		23462 50		46915 01	
					NET PD/REF		00		00		00	
					DUE		23452 51		23462 50		46915 01	

ROLL YEAR	CURRENT ASSESSED VALUE	PRIOR ASSESSED VALUE	TAXABLE VALUE
LAND	1810921		1810921
IMPROVEMENTS	1207278		1207278
FIXTURES			
AUTH. NO.: 000153 LC			TOTAL 3018199
PRINT DATE: 05 15 24			LESS EXEMPTION
			NET TAXABLE VALUE 3018199

ANY RETURNED PAYMENT MAY BE
SUBJECT TO A FEE UP TO \$50.00.

ANNUAL

DETACH HERE

COLYTON INVESTMENTS LLC
264 S OAKHURST DR
BEVERLY HILLS CA 90212-3504

000153 LC

PAY THIS
AMOUNT BY:

04 10 24

USE THESE NUMBERS ON ALL PAYMENTS AND CORRESPONDENCE					
ASSESSOR'S ID. NO.					
Map Book	Page	Parcel	Year	Seq. No.	Pay Key
5163	025	007	23	000	2
2ND INSTALLMENT			INDICATE AMOUNT PAID		
23462 50					

If not paid by
add penalty and cost
of
to 2nd installment

for a total of:

MAKE PAYMENT PAYABLE TO:
Please write the ASSESSOR'S
ID. NO. on the lower left corner
of your payment

LOS ANGELES COUNTY TAX COLLECTOR
P.O. BOX 54018
LOS ANGELES, CA 90054-0018

63288

CRT: R#43
E655416

99623000351630250070002346250000234625028829999

DETACH AND MAIL THIS STUB WITH 2ND INSTALLMENT PAYMENT

ANNUAL

DETACH HERE

COLYTON INVESTMENTS LLC
264 S OAKHURST DR
BEVERLY HILLS CA 90212-3504

000153 LC

PAY THIS
AMOUNT BY:

12 10 23

USE THESE NUMBERS ON ALL PAYMENTS AND CORRESPONDENCE					
ASSESSOR'S ID. NO.					
Map Book	Page	Parcel	Year	Seq. No.	Pay Key
5163	025	007	23	000	1
1ST INSTALLMENT			INDICATE AMOUNT PAID		
23452 51					

If not paid by
add penalty
of
to 1st installment

for a total of:

MAKE PAYMENT PAYABLE TO:
Please write the ASSESSOR'S
ID. NO. on the lower left corner
of your payment

LOS ANGELES COUNTY TAX COLLECTOR
P.O. BOX 54018
LOS ANGELES, CA 90054-0018

63211

CRT: R#43
E655416

99623000351630250070002345251000234525121119999

DETACH AND MAIL THIS STUB WITH 1ST INSTALLMENT PAYMENT



ELIZABETH BUENROSTRO GINSBERG
TREASURER AND TAX COLLECTOR

**COUNTY OF LOS ANGELES
TREASURER AND TAX COLLECTOR**

Kenneth Hahn Hall of Administration
225 North Hill Street, Room 130
Los Angeles, California 90012
Telephone: (213) 974-7803 Fax: (213) 680-3648
ttc.lacounty.gov and propertytax.lacounty.gov

Board of Supervisors
HILDA L. SOLIS
First District
HOLLY J. MITCHELL
Second District
LINDSEY P. HORVATH
Third District
JANICE HAHN
Fourth District
KATHRYN BARGER
Fifth District

CLAIM ATTACHMENT SHEET

Name: **Colyton Investments, LLC**
AIN(s): **5163-025-007**
Mailing Address: **264 S. Oakhurst Dr. Beverly Hills, CA 90212-3504**
Situs: **421 Colyton St, Los Angeles, CA 90013-2210**

This claim is a secured tax secured by a statutory lien under California state law. This claim is secured under 11 U.S.C. Section 506(b).

This claim is subject to interest under California Revenue and Taxation Code Section 4103, 11 U.S.C. Section 506 (b) and 11 U.S.C. Section 511 as well as costs, fee, and attorney fees.

The claim will continue to increase, and interest will continue to accrue until it is paid.

Estimated taxes for **2024-2025** in the amount of **\$46,905.00** are due to the statutory lien date of January 1st per the California Revenue and Taxation Code Section 2192. An Amended claim will be filed once the exact dollar amount is available.

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is:
11766 Wilshire Blvd., Suite 730, Los Angeles, CA 90025

A true and correct copy of the foregoing document entitled: **NOTICE OF OBJECTION TO CLAIM** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On *(date)* 08/09/2024, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

See attached NEF service list

☒ Service information continued on attached page

2. SERVED BY UNITED STATES MAIL:

On *(date)* 08/09/2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Los Angeles County Treasurer and Tax Collector
PO Box 54110
Los Angeles, CA 90054

☐ Service information continued on attached page

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on *(date)* 08/09/2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

The Honorable Vincent Zurzolo
United States Bankruptcy Court
255 East Temple St., Suite 1360
Los Angeles, CA 90012
(via Priority Mail)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

<u>08/09/2024</u>	<u>Martha E. Araki</u>	<u>/s/ Martha E. Araki</u>
<i>Date</i>	<i>Printed Name</i>	<i>Signature</i>

Seaton Investments, LLC – Jointly Administered

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):

- Attorneys for Corporate Debtors Seaton Investment, LLC, Colyton Investments, LLC, Broadway Avenue Investments, LLC, Negev Investments, LLC, SLA Investments, LCC.: **Derrick Talerico:** dtalerico@wztslaw.com; maraki@wztslaw.com; sfritz@wztslaw.com
- Attorneys for Individual Debtors Alan Gomperts, Daniel Halevy, Susan Haley: **Zev Shechtman, Carol Chow, Turner Falk:** zev.shechtman@salu.com; zshechtman@ecf.inforuptcy.com; carol.chow@saul.com; easter.santamaria@saul.com; turner.falk@saul.com
- Attorneys for Creditor Korth Direct Mortgage, Inc.: **Tanya Behnam:** tbehnam@polsinelli.com, tanyabehnam@gmail.com; ccripe@polsinelli.com; ladocketing@polsinelli.com
- Courtesy NEF/Interested Party: **Christopher Cramer:** secured@becket-lee.com
- Attorneys for Creditor Archway Real Estate Income Fund I SPE I, LLC: **Michael G. Fletcher, Bruce D. Poltrock, Gerrick Warrington:** mfletcher@frandzel.com; gwarrington@frandzel.com; bpoltrock@frandzel.com; sking@frandzel.com; achase@frandzel.com
- Attorneys for Creditor Wells Fargo National Bank West: **Todd S Garan:** ch11ecf@aldridgepite.com; TSG@ecf.inforuptcy.com; tgaran@aldridgepite.com
- Attorneys for Creditor Harvest Small Business Finance, LLC: **Jacqueline L James:** jjames@hrhlaw.com
- Courtesy NEF/Interested Party Avi Muhtar: **Avi Edward Muhtar:** amuhtar@eaccidents.com
- Courtesy NEF/Interested Party: **Jennifer C Wong:** bknotice@mccartyholthus.com; jwong@ecf.courtdrive.com
- US Trustee's Office: ustpregion16.la.ecf@usdoj.gov; **Kelly L. Morrison:** Kelly.l.morrison@usdoj.gov